## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

HAYWARD INDUSTRIES, INC.,

Plaintiff

v.

Civil Action No. 3:20-CV-710 -MOC-SCR

BLUEWORKS CORPORATION, BLUEWORKS INNOVATION CORPORATION, NINGBO C.F. ELECTRONIC TECH CO., LTD; NINGBO YISHANG IMPORT AND EXPORT CO., LTD.

Defendants.

## CONSENT MOTION FOR DEFENDANTS' RELIEF FROM THE TEMPORARY RESTRAINING ORDER

Defendants Blueworks Corporation ("Blueworks Corp."), Blueworks Innovation Corporation ("Blueworks Innovation"), Ningbo C.F. Electronic Tech Co., Ltd. ("Ningbo C.F."), and Ningbo Yishang Import and Export Co., Ltd. ("Ningbo Yishang") (collectively, "Defendants") hereby move the Court for Relief from the Temporary Restraining Order [DE 393]. The Court instructed the Defendants to request relief on a case-by-case basis in its Order on Defendants' Motion for Clarification [DE 404].

Defendants seek relief to transfer assets for payment to a trial vendor as set forth in Defendants' Memorandum of Law in support of this motion being filed contemporaneously herewith.

Pursuant to LCvR 7.1(b), the parties conferred by email on April 18 and April 19, 2024 and counsel for Plaintiff consented to Defendants' Motion.

## Dated: April 19, 2024 Respectfully submitted,

/s/ Christina Davidson Trimmer

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Attorneys for Defendants

## **CERTIFICATE OF SERVICE**

I hereby certify that on April 19, 2024, the foregoing document was served on all counsel of record using the Court's CM/ECF system, which will send notification of such filing to any CM/ECF participants.

Respectfully submitted,

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